

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

**UNOPPOSED MOTION TO SEAL DEFENDANTS TAKE-TWO INTERACTIVE
SOFTWARE, INC. AND 2K GAMES, INC.'S SUPPLEMENTAL REPLY IN SUPPORT
OF MOTION FOR SUMMARY JUDGMENT, AND EXHIBITS THERETO**

In accordance with Local Rule 5.2 and the Court's Protective Order (Dkt. 32), Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, "Take-Two") hereby move for leave to file under seal: (1) an unredacted version of their forthcoming supplemental reply in support of their motion for summary judgment and (2) accompanying exhibits. Specifically, Take-Two moves for leave to redact from its supplemental reply and file under seal exhibits that contain information that was designated as confidential by the parties and certain third parties, pursuant to the Protective Order entered in this case. Dkt. 32. To maintain the confidentiality of that information, therefore, Take-Two will file a public version of its supplemental reply that has the designated-as-confidential information redacted, and seeks leave by this motion to file the unredacted version and its accompanying exhibits under seal. Take-Two will serve Plaintiff with the unredacted versions of all filings including the supplemental reply and exhibits, and will file under seal the unredacted versions when the Court grants this motion or as otherwise directed by the Court.

Take-Two explained the basis for this motion to Plaintiff, and he does not oppose it.

Dated: July 20, 2022

/s/ Dale M. Cendali

Dale M. Cendali (*pro hac vice*)
Joshua L. Simmons (*pro hac vice*)
Chris Ilardi (*pro hac vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
dale.cendali@kirkland.com
joshua.simmons@kirkland.com
chris.ilardi@kirkland.com

Miranda D. Means (*pro hac vice*)
KIRKLAND & ELLIS LLP
200 Clarendon Street
Boston, Massachusetts 02116
Telephone: (617) 385-7500
miranda.means@kirkland.com

Matthew J. Cavanagh (0079522)
MCDONALD HOPKINS LLC
600 Superior Avenue, East, Ste. 2100
Cleveland, Ohio 44114
Telephone: 216.348.5400
Fax: 216.348.5474
mcavanagh@mcdonaldhopkins.com

*Attorneys for Take-Two 2K Games, Inc. and
Take-Two Interactive Software, Inc.*